

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

Susan Webber and Jonathan St. Goddard,

Plaintiffs,

vs.

U.S. DEPARTMENT OF HOMELAND
SECURITY; KRISTI NOEM in her official capacity;
and THE UNITED STATES OF AMERICA,

Defendants.

DECLARATION OF JONATHAN ST. GODDARD

I, Jonathan St. Goddard, under penalty of perjury declare as follows:

1. I am a rancher and live and work on the Blackfeet Nation, helping operate my family ranch south of Browning.
2. I am an enrolled member of the Blackfeet Tribe. I have relatives who are part of the Siksiki Nation, in Alberta, Canada, which is part of the Blackfeet Confederacy.
3. I cross the border occasionally to see relatives in Canada. I do not have a passport but go back and forth across the border using my tribal identification card.
4. On March 25, 2025, I had a rim break on my tractor wheel. I needed a replacement right away because we are in the middle of calving and it's crucial that we had the tire rim so we could continue feeding and doing daily chores while in calving season.
5. I called a person from Frontline Ag in Cut Bank to see if they had the part that I needed. They would have had to order one of the two parts from the John Deere warehouse overseas. That would have taken a couple of weeks, and I needed it right away.

6. I called the Medicine Hat Tractor Salvage place, and they found the hub and wheel that I needed to keep working. Medicine Hat is in Alberta, across the border in Canada.

7. The replacement wheel cost \$1,790.00 Canadian dollars. Exhibit 1 is a true and correct copy of the invoice for the wheel replacement part I bought.

8. I drove up to pick it up, and when I was coming back, at the border, border patrol agent Nelson asked me what I was doing in Canada. He asked for the receipt, and I had it on my phone, but that didn't work. At first told me that I might have to go through Sweet Grass, which is over 100 miles away. He then asked if I could send him the invoice. I couldn't get a signal, so then I went into their office where they had a booster so I could get a signal and sent him the email invoice from the Tractor Salvage store.

9. Border Patrol Nelson converted the invoice to U.S. Dollars, and then calculated the tariff for the replacement tractor wheel. What came out of my bank account was \$1,252.89 U.S. Dollars. I'm not sure exactly what amount he was using as a basis for the amount that I paid in Canadian dollars.

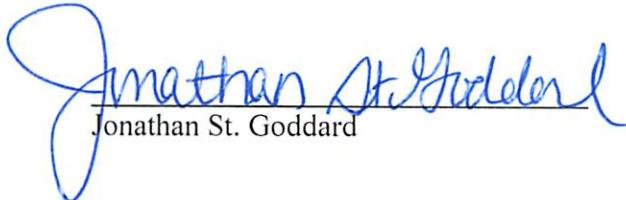
10. Border Patrol Nelson then told me the tariff charge would be \$308.77. He said 25% tariff but didn't clarify what the 25% was for or why it was being charged. I paid the \$308.77 that he said I owed for the tariff. Then he gave me a receipt for the payment of \$308.77 for the tariff. Exhibit 2 is a true and correct copy of the tariff charged at the border for the tractor wheel part that I picked up.

11. A tariff of \$308.77 on a part that cost \$1,252 increases my costs substantially and causes me and by ranch financial stress because we won't be able to pass those kinds of costs on. If tariffs continue, the cost from the tariffs will cause irreparable harm to our family's ranch and agricultural business.

12. The unpredictable costs make it harder to plan and prepare. In ranching you have to be able to plan so you can control all the costs that you can, and being hit with this kind of tariff out of the blue while I was on my way back with a replacement part I needed and couldn't find in the U.S. makes it hard to predict expenses. I budget on an annual basis and these tariffs were not part of this year's operation plan.

I declare under penalty of perjury, on this 3rd day of April, 2025, that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on April 3rd, 2025



Jonathan St. Goddard